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July 23, 2021

Sent via email to FOIAsubmissions@cftc.gov

CFTC FOIA Compliance Office
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

CONFIDENTIAL TREATMENT REQUESTED
17 C.F.R. § 145.9

RE: FOIA Request for Confidential Treatment

Dear Assistant Secretary:

Pursuant to Commission Regulation 145.9, 17 C.F.R. § 145.9, we hereby request on behalf of our client identified in the attached Appendix A that the materials described in Appendix A, and all other information, emails, documents and related materials sent or provided to Commission Staff pertaining to the same subject matter be maintained by the Commission confidentially and be given confidential treatment. Such emails and their enclosures and all other information, emails, documents and related materials pertaining to the same subject matter will hereinafter be referred to collectively as "Client-related information." We request that a copy of this letter accompany the documents and related materials at all times.

More specifically, we request that the Client-related information, in its entirety, be treated as non-public and confidential pursuant to the Freedom of Information Act, 5 U.S.C. § 552, and applicable Commission regulations, and that the Client-related information not be published or made available to any person.

Should any person (including any government employee who is not an employee of the Commission) request an opportunity to inspect or copy any of the Client-related information, we request that we be immediately notified of any such request, be promptly furnished with all written materials pertaining to such request, and be given a reasonable opportunity to respond. We further request that we be promptly notified of any agency determinations with respect to such request and be given at least ten business days' notice prior to any intended release so that we may, if deemed necessary or appropriate, pursue any available remedies.

Furthermore, if the Commission or its Staff tentatively concludes that the Client-related information is not exempt from disclosure pursuant to the Freedom of Information Act or applicable Commission regulations, we request a nonpublic hearing on these claims of exemption. The Client-related information includes non-public matters and sensitive commercial and financial information and is subject to, at a minimum, the exemption from mandatory disclosure under Exemptions 552(b)(3), (4), and (7) of the Freedom of Information Act, 5 U.S.C. § 552(b)(3), (4), and (7); Section 8 of the Commodity Exchange Act, and the Trade Secrets Act, 18 U.S.C. § 1905 (which prohibits "officer[s] or employee[s] of the United States or of any department or agency thereof" from disclosing certain proprietary information "to any extent not authorized by law").

A copy of this letter is being provided to the Commission Staff member who received the Client-related information.

Please feel free to call me if you have any questions.

Sincerely,



Matthew Kulkin

Appendix A attached

Appendix A to Letter from Matthew Kulkin to CFTC FOIA Compliance Office, dated July 23, 2021

Pursuant to Commission Regulation 145.9(d)(6), 17 C.F.R. § 145.9(d)(6), on behalf of ICAP Global Derivatives Limited (“IGDL”), we seek confidential treatment for this Appendix A and all documents and information referenced in this Appendix A.

We hereby petition and request that the following information, documents and related materials submitted by IGDL to the Commission and its Staff be maintained by the Commission confidentially and be given confidential treatment. This information is referenced as “Client-related information” in the accompanying letter requesting confidential treatment to the CFTC FOIA Compliance Office from Matthew Kulkin, dated April 29, 2021.

Client-related information includes, at a minimum:

- IGDL-2021-R-7 – Exhibit A
- IGDL-2021-R-7 – Exhibit B
- IGDL-2021-R-7 – Exhibit C